

Removing the "established business relationship" qualification from the fax regulations is extremely bad for business, forcing associations, such as mine, and other associations to obtain the written consent of our own members, and industry partners before transmitting any fax that could be interpreted as commercial in nature. The association community has already raised numerous concerns about these new regulations which remain a subject of speculation, including exactly which transmissions the FCC would interpret as commercial in nature, whether written consent to a national association would extend to chapter or affiliate faxes, and whether a written consent form would expire with membership, for example. As the executive director of the Private Practice Section of the American Physical Therapy Association, our 3800+ members are small business owners who treat patients during the day and therefore prefer receiving communication from the association and our affiliates via fax. This regulation will impede our ability to communicate with our members, impact their access to information about new educational opportunities or publications and negatively affect their ability to successfully operate their practices. And frankly, it puts an undue burden on both me and my staff to interpret confusing legal regulations. This regulation should be withdrawn immediately.